

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

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KRAEMER BROTHERS, LLC,

Plaintiff,

v.

CMR CONSTRUCTION & ROOFING OF  
TEXAS, LLC, CMR CONSTRUCTION &  
ROOFING, LLC, and STEVEN M. SOULE,

Defendants.

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Case No. 23-cv-703

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**STIPULATION FOR DISMISSAL**

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WHEREAS, the parties entered into a written Settlement Agreement and Release (“Settlement Agreement”);

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties to this action, by their respective undersigned counsel, that:

1. Defendants’ counterclaims shall be dismissed with prejudice, and without costs or fees to any party;
2. Plaintiff’s claims shall be dismissed without prejudice and without costs or fees to any party, subject to Plaintiff’s rights under the Settlement Agreement, including the right to reopen this action to enforce the terms of the Settlement Agreement if necessary; and
3. An order may be entered to the above effect without further notice.

**[Signatures appear on the following page]**

Respectfully submitted this 31<sup>st</sup> day of January, 2025.

VON BRIESEN & ROPER, S.C.

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